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FEB 25 1988

Mr. Randy Moeller
Hazardous Waste Manager
French & Hecht
Walcott, Iowa 52773

RE: French & Hecht, Walcott, Iowa
EPA ID No. IAT200010999

Dear Mr. Moeller:

On September 1, 1987, authorized representatives of the Environmental Protection Agency (EPA) conducted a RCRA Land Disposal Restriction Inspection at the French & Hecht facility in Walcott, Iowa. That inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6927. The purpose of the inspection was to assess your facility's efforts to comply with the land disposal restriction regulations.

According to the waste generation records reviewed by the EPA representatives, since the effective date of the land disposal restriction regulations, French & Hecht has generated between 100 and 1000 kg of hazardous waste per month, and is thus eligible for the small quantity generator exemption to the land disposal restriction requirements. As such, if you ever decide to ship your restricted waste to a land disposal facility, you are required to notify that facility that the waste is currently exempt from the land disposal restrictions.

In their report, the EPA representatives also noted that the still bottoms from the recovery of the spent toluene solvent is listed as a D001 hazardous waste on the manifests. Instead, you should be listing this waste as a F005 hazardous waste. You should make this correction on your future manifests of the still bottoms waste. Because we realize that it could be quite some time before your next shipment of this waste, we are not requesting that you provide a copy of a correctly filled out manifest. However, you should be aware that your manifests will be examined in future inspections of your facility by the Environmental Protection Agency.

WSTM:RCRA:IOWA:SLUGANTZ:2/17/88:mb:2-23

IOWA/SLUGANTZ IOWA/HERSTOWSKI IOWA/FLOURNOY RCRA/SANDERSON WSTM/WAGONER

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RCRA RECORDS CENTER